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21
22 THE UNITED STATES DISTRICT COURT
23 FOR THE DISTRICT OF NEVADA

24 CHANNEL, INC., a New York corporation,) Case No.
25 Plaintiff,)
26 v.)
27 THE PARTNERSHIPS and)
28 UNINCORPORATED ASSOCIATIONS)
29 IDENTIFIED ON SCHEDULE "A" and)
30 DOES 1-1000,)
31 Defendants.)

32 **COMPLAINT FOR INJUNCTIVE RELIEF**

33 Plaintiff CHANNEL, INC. ("Chanel"), a New York corporation, ("Plaintiff" or "Chanel")
34 hereby sues Defendants, THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS
35 IDENTIFIED ON SCHEDULE "A" and DOES 1-1000 (collectively "Defendants"), and alleges as
36 follows:
37

JURISDICTION AND VENUE

1. This is an action pursuant to 15 U.S.C. §§ 1114, 1116, 1121 and 1125(a) and (d).

Accordingly, this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338.

2. Venue is proper in this Court pursuant 28 U.S.C. § 1331, and this Court may properly exercise personal jurisdiction over Defendants since all Defendants directly target business activities towards consumers in Nevada and cause harm to Chanel's business within this District through, at least, various fully interactive Internet websites, including those operating under their partnership and/or unincorporated association names (the "Subject Domain Names").

THE PLAINTIFF

3. Chanel is a corporation duly organized under the laws of the State of New York with its principal place of business in the United States located at Nine West 57th Street, New York, New York 10019. Chanel operates boutiques throughout the world, including within this Judicial District. Chanel is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this Judicial District, a variety of high quality luxury goods, including, but not limited to, handbags, wallets, shoes, boots, sunglasses, scarves, tee shirts, watches, and costume jewelry, including necklaces, bracelets, earrings, brooches, and rings, under multiple world famous common law and Federally registered trademarks including those identified in Paragraph 13 below. Chanel offers for sale and sells its trademarked goods within this Judicial District. Defendants' sales of counterfeit and infringing Chanel branded products are causing damage to Chanel within this Jurisdiction. Chanel regularly enforces its intellectual property rights and authorized that this action be brought in its name.

4. Like all other famous trademark owners in the field of luxury goods, Chanel suffers ongoing daily and sustained violations of its trademark rights at the hands of counterfeiters and infringers, such as the Defendants herein, who wrongfully reproduce and counterfeit Chanel's trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning

1 substantial profits. The natural and intended byproduct of Defendants' actions is the erosion and
2 destruction of the goodwill associated with the Chanel name and associated trademarks.

3 5. In order to combat the harm caused by the combined actions of Defendants and others
4 engaging in similar conduct, each year Chanel expends millions of dollars in connection with
5 trademark enforcement efforts, including legal fees, investigative fees, and support mechanisms for
6 law enforcement, such as field training guides and seminars. The recent explosion of counterfeiting
7 over the Internet has created an environment which requires Chanel to file a massive number of
8 lawsuits, often it later turns out, against the same individuals and groups, in order to protect both
9 consumers and itself from the ill effects of confusion and the erosion of the goodwill connected to
10 the Chanel brand. The financial burden on Chanel and companies similarly situated is staggering, as
11 is the resulting burden on the Federal court system.

12 THE DEFENDANTS

13 6. Defendants are partnerships or unincorporated business associations which operate
14 through domain names registered with registrars in multiple countries, including the United States,
15 the People's Republic of China, and the Commonwealth of the Bahamas, and are comprised of
16 individuals and/or business entities of unknown makeup, many of whom likely reside in the People's
17 Republic of China or other foreign jurisdictions with lax trademark enforcement systems.
18 Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b).
19 Defendants target their business activities towards consumers throughout the United States,
20 including within this Judicial District through the operation of the fully interactive commercial
21 websites operating under the Subject Domain Names identified on Schedule "A" hereto. Multiple
22 Defendants also operate blog style websites under some of the Subject Domain Names which also
23 provide support and direct customer traffic to the fully interactive websites operating under the other
24 Subject Domain Names. Defendants are directly and personally contributing to, inducing and
25 engaging in the sale of counterfeit products as alleged herein, often times as partners, co-conspirators
26 and/or suppliers. The partnership or unincorporated association names used by Defendants are set
27 forth on Schedule "A" hereto. Chanel is presently unaware of the true names of Does 1-1,000.
28 Chanel will amend this Complaint upon discovery of the identities of such fictitious Defendants.

1 7. Defendants are the past and present moving and conscious forces behind the
2 operation of the commercial Internet websites operating under the Subject Domain Names.

3 8. Defendants engage in unfair competition with Chanel and engage in the offering for
4 sale and sale of counterfeit and infringing Chanel branded products within this Judicial District
5 through multiple fully interactive commercial websites operating under at least the Subject Domain
6 Names. Defendants, upon information and belief, also operate additional websites which promote
7 and offer for sale counterfeit and infringing goods under domain names not yet known to Plaintiff.
8 Defendants have purposefully directed their illegal activities towards consumers in the State of
9 Nevada through the advertisement, offer to sell, sale and shipment of counterfeit Chanel branded
10 goods into the State.

11 9. Upon information and belief, Defendants will continue to register or acquire new
12 domain names for the purpose of selling goods bearing counterfeits and infringements of Chanel's
13 trademarks unless preliminarily and permanently enjoined.

14 10. Defendants' Internet-based website businesses amount to nothing more than massive
15 illegal operations, infringing on the intellectual property rights of Chanel and others.

16 11. Defendants use and have registered, established or purchased and maintained the
17 Subject Domain Names. Upon information and belief, Defendants have engaged in fraudulent
18 conduct with respect to the registration of the Subject Domain Names by providing false and/or
19 misleading information to their various Registrars during the Registration or maintenance process.
20 Upon information and belief, many of the Defendants have anonymously registered and maintained
21 some of the Subject Domain Names for the sole purpose of engaging in illegal counterfeiting
22 activities.

23 12. Defendants' business names, i.e., the Subject Domain Names and any other domain
24 names used in connection with the sale of counterfeits bearing Chanel's trademarks, are essential
25 components of Defendants' counterfeiting and infringing activities. The Subject Domain Names
26 themselves are the means by which Defendants further their counterfeiting and infringing scheme
27 and cause harm to Chanel. Moreover, Defendants are using Chanel's famous name and trademarks
28

1 to drive Internet consumer traffic to their websites operating under the Subject Domain Names,
 2 thereby creating and increasing the value of the Subject Domain Names at Chanel's expense.

3 COMMON FACTUAL ALLEGATIONS

4 13. Chanel is the owner of all rights in and to the following trademarks which are valid
 5 and registered on the Principal Register of the United States Patent and Trademark Office:

6 Trademark	7 Registration Number	8 Registration Date	9 Class(es)/Goods
10 CHANNEL	11 0,612,169	12 September 13, 13 1955	14 IC 014 - Necklaces
15 CHANNEL	16 0,626,035	17 May 1, 1956	18 IC 018 – Women's Handbags
19 CHANNEL	20 0,902,190	21 November 10, 22 1970	23 IC 014 - Bracelets, Pins, and Earrings
24 CHANNEL	25 0,906,262	26 January 19, 27 1971	28 IC 025 - Coats, Suits, Blouses, and Scarves
29 CHANNEL	30 0,915,139	31 June 15, 1971	32 IC 025 - Women's Shoes
33 CHANNEL	34 0,955,074	35 March 13, 36 1973	37 IC 014 – Watches
38 	39 1,241,264	40 June 7, 1983	41 IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, Tee-Shirts, [Capes,] Coats, Raincoats, [Jackets Made of Feathers, Shawls,] Scarves, Shoes and Boots
42 CHANNEL	43 1,241,265	44 June 7, 1983	45 IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, [Tee-Shirts, Capes,] Coats, Raincoats, [Jackets Made of Feathers, Shawls,] Scarves, Shoes and Boots

	1,271,876	March 27, 1984	IC 025 - Clothing-Namely, Coats, Dresses, Blouses, Raincoats, Suits, Skirts, Cardigans, Sweaters, Pants, Jackets, Blazers, [Shawls, Hats] and Shoes
	1,314,511	January 15, 1985	IC 018 - Leather Goods-Namely, Handbags, [Wallets, Travel Bags, Luggage, Credit Card And Business Card Cases, Make-Up Bags and Vanity Cases Sold Empty, Briefcase-Type Portfolios; Attaché Cases, Change Purses, Suitcases, Tote Bags, Garment Bags and Travelers' Shoe Bags]
CHANEL 	1,329,750	April 9, 1985	IC 025 - Blouses, Skirts, Sweaters, Cardigans, Dresses [Shawls, Scarves, Hats, Collars, Cuffs and Neckties]
CHANEL	1,347,677	July 9, 1985	IC 018 - Leather Goods-namely, Handbags [Wallets, Travel Bags, Luggage, Business and Credit Card Cases, Brief Case Type Portfolios, Attaché Cases, Change Purses, Suitcases, Tote Bags, Make-Up Bags and Vanity Cases Sold Empty, Garment Bags for Travel and Travelers' Shoe Bags]
	1,501,898	August 30, 1988	IC 006 - Keychains IC 014 - Costume Jewelry IC 016 - Gift Wrapping Paper IC 025 - Blouses, Shoes, Belts, Scarves, Jackets, Men's Ties IC 026 - Brooches and Buttons for Clothing
CHANEL	1,510,757	November 1, 1988	IC 009 - Sunglasses
	1,654,252	August 20, 1991	IC 009 - Sunglasses

1	CHANEL	1,733,051	November 17, 1992	IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business and Credit Card Cases, Change Purses, Tote Bags, Cosmetic Bags Sold Empty, and Garment Bags for Travel
2		1,734,822	November 24, 1992	IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business Card Cases, Change Purses, Tote Bags, and Cosmetic Bags Sold Empty
3	J12	2,559,772	April 9, 2002	IC 014 - Timepieces; namely, Watches, and Parts Thereof
4				IC 006 - Key Chains
5				IC 009 - Ski Goggles, Sunglasses
6				IC 018 - Luggage, Handbags, Totes, Backpacks, Travel Bags, All-Purpose Carrying Bags, Umbrellas
7		3,022,708	December 6, 2005	IC 025 - Boots, Coats, Jackets, Gloves, Hats, Pants, Sandals, Scarves, Shirts, Shoes, Ski Boots, Sun Visors, Suspenders, Sweatbands, Swimwear
8				IC 028 - Bags Specially Adopted For Sports Equipment, Basketballs, Kites, Skis, Ski Polls, Tennis Rackets, Tennis Balls, Tennis Racket Covers, Golf Clubs, Golf Bags, and Snow Boards
9		3,025,934	December 13, 2005	IC 018 - Handbags
10				IC 009 - Mobile Phone Straps, Eyeglass Frames, Sunglasses
11		3,025,936	December 13, 2005	IC 025 - Gloves, Swimwear
12				IC 026 - Hair Accessories namely Barrettes and Pony-Tail Holders

1	CHANEL	3,133,139	August 22, 2006	IC 014 - Jewelry and Watches
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3 (the "Chanel Marks") and are used in connection with the manufacture and distribution of high
4 quality goods in the categories identified above.

5 14. The Chanel Marks have been used in interstate commerce to identify and distinguish
6 Chanel's high quality handbags, wallets, shoes, boots, sunglasses, scarves, tee shirts, watches,
7 costume jewelry, including necklaces, bracelets, earrings, brooches, and rings, and other goods for
8 an extended period of time.

9 15. The Chanel Marks have never been assigned or licensed to any of the Defendants in
10 this matter.

11 16. The Chanel Marks are symbols of Chanel's quality, reputation and goodwill and have
12 never been abandoned.

13 17. Further, Chanel has expended substantial time, money and other resources
14 developing, advertising and otherwise promoting the Chanel Marks. The Chanel Marks qualify as
15 famous marks as that term is used in 15 U.S.C. §1125(c)(1).

16 18. Chanel has extensively used, advertised and promoted the Chanel Marks in the
17 United States in association with the sale of high quality handbags, wallets, shoes, boots, sunglasses,
18 scarves, tee shirts, watches, costume jewelry, including necklaces, bracelets, earrings, brooches, and
19 rings, and other goods and has carefully monitored and policed the use of the Chanel Marks.

20 19. As a result of Chanel's efforts, members of the consuming public readily identify
21 merchandise bearing the Chanel Marks, as being high quality luxury goods sponsored and approved
22 by Chanel.

23 20. Accordingly, the Chanel Marks have achieved secondary meaning as identifiers of
24 high quality handbags, wallets, shoes, boots, sunglasses, scarves, tee shirts, watches, costume
25 jewelry, including necklaces, bracelets, earrings, brooches, and rings, and other goods.

26 21. Genuine Chanel branded goods are widely legitimately advertised and promoted by
27 Chanel, its authorized distributors and unrelated third parties via the Internet. Over the course of the
28

1 past five to seven years, visibility on the Internet, particularly via Internet search engines such as
 2 Google, Yahoo!, and Bing has become increasingly important to Chanel's overall marketing and
 3 consumer education efforts. Thus, Chanel expends significant monetary resources on Internet
 4 marketing and consumer education, including search engine optimization ("SEO") strategies. Those
 5 strategies allow Chanel and its authorized retailers to fairly and legitimately educate consumers
 6 about the value associated with the Chanel brand and the goods sold thereunder. SEO is a now
 7 common marketing process whereby a company or individual designs, supports, structures and
 8 phrases Internet website content in order to enhance a website's profile for search engines over a
 9 variety of search terms.

10 22. Upon information and belief, at all times relevant hereto, Defendants in this action
 11 have had full knowledge of Chanel's ownership of the Chanel Marks, including its exclusive right to
 12 use and license such intellectual property and the goodwill associated therewith.

13 23. Chanel has discovered Defendants are promoting and otherwise advertising,
 14 distributing, selling and/or offering for sale counterfeit products, including, at least, handbags,
 15 wallets, shoes, boots, sunglasses, scarves, tee shirts, watches, and costume jewelry, including
 16 necklaces, bracelets, earrings, brooches, and rings bearing marks which are exact copies or colorable
 17 imitations of the Chanel Marks (the "Defendants' Goods"). Specifically, upon information and
 18 belief, Defendants are using the Chanel Marks for different quality goods.

19 24. The Defendants' Goods are of a quality substantially different than that of Chanel's
 20 genuine goods. Despite the nature of the Defendants' Goods and the knowledge they are without
 21 authority to do so, Defendants are actively using, promoting and otherwise advertising, distributing,
 22 selling and/or offering for sale substantial quantities of such goods with the knowledge that such
 23 goods will be mistaken for the genuine high quality products offered for sale by Chanel. The net
 24 effect of Defendants' actions will be to result in the confusion of consumers at the time of initial
 25 interest, sale, and in the post-sale setting, who will believe Defendants' Goods are genuine goods
 26 originating from, associated with, and approved by Chanel.

27
 28

1 25. Defendants advertise their products for sale to the consuming public. In so advertising
2 these products, Defendants improperly and unlawfully use the Chanel Marks. Upon information and
3 belief, the misappropriation of the Chanel Marks has been the proximate cause of harm to Chanel.

4 26. As part of their overall infringement and counterfeiting scheme, the Defendants are,
5 upon information and belief, all employing substantially similar, and often times coordinated, SEO
6 strategies based, in large measure, upon an illegal use of counterfeits and infringements of the
7 Chanel Marks. Specifically, the Defendants are using counterfeits of Chanel's name and the Chanel
8 Marks in order to make their websites selling illegal goods appear more relevant and attractive to
9 search engines across an array of search terms. By their actions, the Defendants are causing
10 concurrent and indivisible harm to Chanel and the consuming public by (i) depriving Chanel and
11 other third parties of the ability to fairly compete for space within search engine results, (ii) causing
12 an overall degradation of the value of the goodwill associated with the Chanel Marks and (iii)
13 increasing Chanel's overall cost to market its goods and educate consumers about the brand via the
14 Internet.

15 27. Upon information and belief, Defendants are concurrently conducting their
16 counterfeiting and infringing activities, at least, within this Judicial District and elsewhere
17 throughout the United States. As a result, Defendants are defrauding Chanel and the consuming
18 public for Defendants' own benefit. Defendants' infringement and disparagement of Chanel does not
19 simply amount to the wrong description of their goods or the failure of the goods to conform to the
20 advertised quality or performance.

21 28. Defendants' use of the Chanel Marks, including the promotion and advertisement,
22 reproduction, distribution, sale, and offering for sale of Defendants' Goods, is without Chanel's
23 consent or authorization.

24 29. Further, Defendants are engaging in the above-described illegal counterfeiting and
25 infringing activities knowingly and intentionally or with reckless disregard or willful blindness to
26 Chanel's rights for the purpose of trading on the goodwill and reputation of Chanel.

27 30. Defendants' above-identified infringing activities are likely to cause confusion,
28 deception and mistake in the minds of consumers, the public and the trade. Moreover, Defendants'

1 wrongful use of the Chanel Marks is likely to create a false impression and deceive customers, the
2 public and the trade into believing there is a connection or association between Chanel and
3 Defendants' Goods.

4 31. Chanel has no adequate remedy at law.

5 32. Chanel is suffering irreparable and indivisible injury and damages as a result of
6 Defendants' unauthorized and wrongful use of the Chanel Marks. If Defendants' counterfeiting,
7 infringing, and unfairly competitive activities are not preliminarily and permanently enjoined by this
8 Court, Chanel and the consuming public will continue to be harmed.

9 33. The injuries and damages sustained by Chanel have been directly and proximately
10 caused by Defendants' wrongful reproduction, use, advertisement, promotion, offering to sell, and
11 sale of the Defendants' Goods.

12 34. Chanel has retained the undersigned counsel to represent it in this matter and is
13 obligated to pay said counsel a reasonable fee for such representation.

14 **COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT**

15 35. Chanel hereby re-adopts and re-alleges the allegations set forth in Paragraphs 1
16 through 34 above.

17 36. This is an action for trademark counterfeiting and infringement against Defendants
18 based on their use of counterfeits, copies, and/or colorable imitations of the Chanel Marks in
19 commerce in connection with the promotion, advertisement, distribution, sale and/or offering for
20 sale of the Defendants' Goods.

21 37. Specifically, Defendants are promoting and otherwise advertising, selling, offering
22 for sale and distributing, at least, counterfeit and/or infringing handbags, wallets, shoes, boots,
23 sunglasses, scarves, tee shirts, watches, and costume jewelry, including necklaces, bracelets,
24 earrings, brooches, and rings bearing the Chanel Marks. Defendants are continuously infringing and
25 inducing others to infringe the Chanel Marks by using them to advertise, promote and sell, at least,
26 counterfeit and infringing handbags, wallets, shoes, boots, sunglasses, scarves, tee shirts, watches,
27 and costume jewelry, including necklaces, bracelets, earrings, brooches, and rings.

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1 38. Defendants' concurrent counterfeiting, infringing, and unfairly competitive activities
2 are likely to cause and, upon information and belief, actually are causing confusion, mistake and
3 deception among members of the trade and the general consuming public as to the origin and quality
4 of Defendants' Goods bearing or sold using the Chanel Marks.

5 39. Defendants' unlawful actions have caused and are continuing to cause unquantifiable
6 and irreparable harm to Chanel.

7 40. Defendants' above-described illegal actions constitute counterfeiting and
8 infringement of the Chanel Marks in violation of Chanel's rights under § 32 of the Lanham Act, 15
9 U.S.C. § 1114.

10 41. Chanel has suffered and will continue to suffer irreparable injury due to the above
11 described activities of Defendants if Defendants are not preliminarily and permanently enjoined.

COUNT II - FALSE DESIGNATION OF ORIGIN

PURSUANT TO § 43(a) OF THE LANHAM ACT

14 42. Chanel hereby re-adopts and re-alleges the allegations set forth in Paragraphs 1
15 through 34 above.

16 43. Defendants' Goods bearing and sold under the Chanel Marks have been widely
17 advertised and distributed throughout the United States.

18 44. Defendants' Goods bearing and sold under the Chanel Marks are virtually identical in
19 appearance to each of Chanel's genuine goods. However, the Defendants' Goods are different in
20 quality. Accordingly, Defendants' activities are likely to cause confusion in the trade and among the
21 general public as to at least the origin or sponsorship of the Defendants' Goods.

22 45. Defendants, upon information and belief, have used in connection with their
23 advertisement and sale of products, false designations of origins and false descriptions and
24 representations, including words or other symbols and trade dress which tend to falsely describe or
25 represent such goods and have caused such goods to enter into commerce with full knowledge of the
26 falsity of such designations of origin and such descriptions and representations, all to the detriment
27 of Chanel.

1 46. Specifically, Defendants have authorized an infringing use of the Chanel Marks, in
2 Defendants' advertisement and promotion of their counterfeit and infringing handbags, wallets,
3 shoes, boots, sunglasses, scarves, tee shirts, watches, and costume jewelry, including necklaces,
4 bracelets, earrings, brooches, and rings. Defendants have also misrepresented to members of the
5 consuming public that the products being advertised and sold by them are genuine, non-infringing
6 products.

7 47. Additionally, Defendants are using counterfeits and infringements of the Chanel
8 Marks in order to unfairly compete with Chanel and others for space within search engine organic
9 results, thereby jointly depriving Chanel of a valuable marketing and educational tool which would
10 otherwise be available to Chanel.

11 48. Defendants' above-described actions are in violation of Section 43(a) of the Lanham
12 Act, 15 U.S.C. §1125(a).

13 49. Chanel has sustained indivisible injury and harm caused by Defendants' concurrent
14 conduct, and absent an entry of an injunction by this Court, Chanel will continue to suffer irreparable
15 injury to its goodwill and business reputation as well as monetary damages.

COUNT III - CLAIM FOR RELIEF FOR CYBERPIRACY

UNDER §43(d) OF THE LANHAM ACTION, 15 U.S.C. §1125(d)

18 50. Chanel hereby readopts and re-alleges the allegations set forth in Paragraphs 1
19 through 34 above.

20 51. At all times relevant hereto, Chanel has been and still is the owner of the rights, title
21 and interest in and to the Chanel Marks.

22 52. Upon information and belief, Defendants have acted with the bad faith intent to profit
23 from the Chanel Marks and the goodwill associated with the Chanel Marks by registering various
24 domain names which are identical or confusingly similar to or dilutive of the Chanel Marks.

25 53. Defendants have no intellectual property rights in or to the Chanel Marks.

26 54. Defendants' actions constitute cyberpiracy in violation of §43(d) of the Lanham Act,
27 15 U.S.C. §1125(d).

1 55. Defendants' conduct is done with knowledge and constitutes a willful violation of
2 Chanel's rights in the Marks. At a minimum, Defendants' conduct constitutes reckless disregard for
3 and willful blindness to Chanel's rights.

4 56. The aforesaid conduct is causing Chanel damages and immediate and irreparable
5 injury. Chanel has no adequate remedy at law.

COUNT IV - COMMON LAW UNFAIR COMPETITION

7 57. Chanel hereby readopts and re-alleges the allegations set forth in Paragraphs 1
8 through 34 above.

9 58. This is an action against Defendants based on their manufacture, promotion,
10 advertisement, distribution, sale and/or offering for sale of goods bearing marks which are virtually
11 identical, both visually and phonetically, to the Chanel Marks in violation of Nevada's common law
12 of unfair competition.

13 59. Specifically, the Defendants are promoting and otherwise advertising, selling,
14 offering for sale and distributing infringing and counterfeit handbags, wallets, shoes, boots,
15 sunglasses, scarves, tee shirts, watches, and costume jewelry, including necklaces, bracelets,
16 earrings, brooches, and rings. The Defendants are also using counterfeits and infringements of the
17 Chanel Marks to unfairly compete with Chanel and others for space in search engine results across
18 an array of search terms.

19 60. Defendants' infringing activities are likely to cause and actually are causing
20 confusion, mistake and deception among members of the trade and the general consuming public as
21 to the origin and quality of Defendants' products by their use of the Chanel Marks.

22 61. Chanel has no adequate remedy at law and is suffering and irreparable injury as a
23 result of Defendants' actions.

PRAYER FOR RELIEF

25 62. WHEREFORE, Chanel demands judgment on all Counts of this Complaint and entry
26 of an award of equitable relief against Defendants as follows:

27 a. Entry of preliminary and permanent injunction enjoining Defendants, their
28 agents, representatives, servants, employees, and all those acting in concert or participation

1 therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting,
2 distributing, selling or offering to sell the Defendants' Goods; from infringing, counterfeiting, or
3 diluting the Chanel Marks; from using the Chanel Marks, or any mark or trade dress similar thereto,
4 in connection with the sale of any unauthorized goods; from using any logo, trade name or
5 trademark or trade dress which may be calculated to falsely advertise the services or products of
6 Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with
7 Chanel; from falsely representing themselves as being connected with Chanel, through sponsorship
8 or association, or engaging in any act which is likely to falsely cause members of the trade and/or of
9 the purchasing public to believe any goods or services of Defendants, or in any way endorsed by,
10 approved by, and/or associated with Chanel; from using any reproduction, counterfeit, infringement,
11 copy, or colorable imitation of the Chanel Marks in connection with the publicity, promotion, sale,
12 or advertising of any goods sold by Defendants, including, without limitation, handbags, wallets,
13 shoes, boots, sunglasses, scarves, tee shirts, watches, and costume jewelry, including necklaces,
14 bracelets, earrings, brooches, and rings; from affixing, applying, annexing or using in connection
15 with the sale of any goods, a false description or representation, including words or other symbols
16 tending to falsely describe or represent Defendants' goods as being those of Chanel, or in any way
17 endorsed by Chanel and from offering such goods in commerce; from engaging in search engine
18 optimization strategies using colorable imitations of the Chanel name or Marks; and from otherwise
19 unfairly competing with Chanel.

20 b. Entry of an Order that, upon Chanel's request, those in privity with
21 Defendants and those with notice of the injunction, including any Internet search engines, Web
22 hosts, domain-name registrars and domain-name registries or their administrators that are provided
23 with notice of the injunction, cease facilitating access to any or all domain names and websites
24 through which Defendants engage in the sale of counterfeit and infringing goods using the Chanel
25 Marks.

26 c. Entry of an Order that, upon Chanel's request, the top level domain (TLD)
27 Registries for the Subject Domain Names and their administrators place the Subject Domain Names

1 on Registry Hold status, thus removing them from the TLD zone files maintained by the Registries
2 which link the Subject Domain Names to the IP addresses where the associated websites are hosted.

3 d. Entry of an order canceling or, at Chanel's election, transferring the Subject
4 Domain Names and any other domain names used by the Defendants to engage in their
5 counterfeiting of the Chanel Marks at issue to Chanel's control so they may no longer be used for
6 illegal purposes.

7 e. Entry of an order that, upon Chanel's request, the Internet Corporation for
8 Assigned Names and Numbers ("ICANN") shall take all actions necessary to ensure that the top
9 level domain Registries responsible for the Subject Domain Names transfer and/or disable the
10 Subject Domain Names as directed by the Court.

11 f. Entry of an award of Chanel's costs and reasonable attorneys' fees and
12 investigative fees associated with bringing this action.

13 g. Entry of further relief as the Court may deem just and proper.

14 Dated: September 20th, 2011

Respectfully submitted,

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34 *Attorneys for Plaintiff Chanel, Inc.*

SCHEDULE A

DEFENDANTS BY SUBJECT DOMAIN NAMES AND DEFENDANT NUMBER

Defendant 1	eukuk.com ktiffany.com a2o5.com*
Defendant 2	canadatoryburch.net toryburchcanada.net
Defendant 3	chanelbagsnow.com chanelbagsol.com coachbagsol.com
Defendant 4	cheapbagsgarden.com cheapbagssales.com
Defendant 5	cheapsunglassesoutlet.org designersunglassesoutlet.org
Defendant 6	clothes2supplier.net store6.net
Defendant 7	co-bag.com cobags.com
Defendant 8	dgshoestores.com dgshoestores.net
Defendant 9	fakeoakleysunglasses2u.com shoessaleusa.com towholesaler.com
Defendant 10	heheebags.com hehegbags.com herebags.com
Defendant 11	hotdiscountshoes.com leletrade.com
Defendant 12	bags-shoes-china.com iofferb2b.com kairystrade.com
Defendant 13	lady-store.net lovecoachs.com
Defendant 14	louisvuittonhandbagsonsale.net louisvuittonidea.com
Defendant 15	luxury-designerhandbags.net outlet-designerhandbags.net
Defendant 16	lv06.com lveshopping.com

1	Defendant 17	myhandbaghut.com myskyshoes.com
2	Defendant 18	raybansunglasseshut.net sunglassesoutletshop.net
3	Defendant 19	topwholesalefashion.com topwholesalefashion.net
4	Defendant 20	cheap-handbags-edge.com wholesalebrandhandbags.us wholesalecheapjewelrys.com wholesale-cheap-jewelrys.com wholesalejewelrysmart.com
5	Defendant 21	knockoffo.com tpurses.com
6	Defendant 22	oakleysunglass-cheap.com oakleysunglassesaaa.com oakleysunglassesstopsale.com
7	Defendant 23	highheeled-shoes.com hulantrading.com women-high-heels.com
8	Defendant 24	co-cochanel.com sexybikinissunglass.com womanhighheel.com
9	Defendant 25	mynike-shoe.com chian-jmmc.com* furnesstoolset.com* gigglesandsunshine.com*
10	Defendant 26	ezshopchina.com luxuryshoechina.com urbanclothesmall.com
11	Defendant 27	hketa.net watchessell.net
12	Defendant 28	lilykala21.com maplem2010.com
13	Defendant 29	puretimeshop.com blog4rolex.com*
14	Defendant 30	ideal-replica.com popselling.com
15	Defendant 31	eb67.com eb97.com weekbag.com
16	Defendant 32	sunglasseshut-us.com sunglassesonlinestore-us.com
17	Defendant 33	sweet-bag.com vogue-bags.com
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1	Defendant 34	discount-wholesalejewelry.com wholesale-cheapjewelry.com wholesale-cheap-jewelry.com
2	Defendant 35	chanelhandbagsforcheap.com cocochanelbags.net tiffanyandco-us.net
3	Defendant 36	cheapclothingshop.com cheapshoesclothes.com chinaclothingstore.com
4	Defendant 37	buychanelhandbagsonline.net chanelbags-shop.com chanelbags-shop.net
5	Defendant 38	crazy-trade.com worthtobuy.com
6	Defendant 39	asiahongs.com nowmalls.com
7	Defendant 40	guccihandbagsnet.com usshoesnet.com
8	Defendant 41	linkcl.com linkcl.us outletsky.com shoe-sandals.com
9	Defendant 42	buyluxurynow.com fairoptical.com jewelryshopnow.com
10	Defendant 43	auchannel.com shoeshheelswedges.com bagsarticle.com*
11	Defendant 44	handbagsdesignercheap.com bags-diary.com*
12	Defendant 45	discount-sunglasshut.com mysunglasshut.com
13	Defendant 46	brandbagshop.org popularbags.org topbrandbag.net
14	Defendant 47	chbagshop.com cheapbagsforsale.net cheapchbagsforsale.com newchsale.com
15	Defendant 48	ebuysunglasses.com sellsunglass.com
16	Defendant 49	channelsaleonline.com cheapchanelsale.com
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1	Defendant 50	newfashiontalk.com stylestalks.com
2	Defendant 51	cheapsunglassesbrands.com cheapsunglassesmarket.com
3	Defendant 52	coachonline-sale.org beautifulboygirl.com* supplier-shops.com*
4	Defendant 53	hellorolex.com travelinginfos.com*
5	Defendant 54	replica-watches-brands.com watchfordream.net chanelreplicawatches.org*
6	Defendant 55	cheap-discount-jordans.com favourite-bags.com nikeairjordanssell.com l-price.com applehot.com* dvdwhole.com*
7	Defendant 56	chanelbagsusa.com luxurybags123.com*
8	Defendant 57	111mall.com
9	Defendant 58	2011missupra.com
10	Defendant 59	2011sunglasseshut.com
11	Defendant 60	2buytiffany.com
12	Defendant 61	51will.net
13	Defendant 62	520watches.com
14	Defendant 63	925mall.com
15	Defendant 64	aaa-handbag.com
16	Defendant 65	a-beststore.com
17	Defendant 66	accessorywow.com
18	Defendant 67	acheterchanelonline.com
19	Defendant 68	agoodbags.info
20	Defendant 69	allbazaar.net
21	Defendant 70	allbrandoutlet.com
22	Defendant 71	asunglassesoutlet.com
23	Defendant 72	atwholesalestore.com

1	Defendant 73	auburnhometownrealty.com
2	Defendant 74	authenticbagsonsale.com
3	Defendant 75	authentic-chanel-outlet.com
4	Defendant 76	authentichandbagsshop.com
5	Defendant 77	b2changbagsoutlet.com
6	Defendant 78	bag2u.com
7	Defendant 79	bagsbestshop.com
8	Defendant 80	bagscoming.com
9	Defendant 81	bags-easy.com
10	Defendant 82	bagsshowtime.com
11	Defendant 83	bagswatchoutlet.com
12	Defendant 84	bagswholesales.com
13	Defendant 85	bagsyard.com
14	Defendant 86	baratoschanel.com
15	Defendant 87	besthandbags-sales.com
16	Defendant 88	best-highheels.com
17	Defendant 89	bestsunglassesoutlet.com
18	Defendant 90	best-watch-shop.com
19	Defendant 91	bigtimesunnies.com
20	Defendant 92	brandbagfactory.com
21	Defendant 93	brandhat.net
22	Defendant 94	brandnewhandbag.com
23	Defendant 95	brandreplicashop.com
24	Defendant 96	brand-sneakers.net
25	Defendant 97	brandstyleline.com
26	Defendant 98	brandsunglassessupplier.com
27	Defendant 99	brandwatch8.com
28	Defendant 100	breaksneaker.com

1	Defendant 101	btobuy.com
2	Defendant 102	bulkforu.com
3	Defendant 103	buychanelhere.com
4	Defendant 104	buy-cheap-chanel.com
5	Defendant 105	buy-jordons.com
6	Defendant 106	buysunglassesus.com
7	Defendant 107	buyswissreplicawatches.com
8	Defendant 108	ca147.com
9	Defendant 109	ceramicj12watches.com
10	Defendant 110	chanel0nline.com
11	Defendant 111	chanelbag-online.com
12	Defendant 112	chanelbagoutlets.net
13	Defendant 113	chanelbags2011.com
14	Defendant 114	chanelbags2012.com chanelbags-2012.com
15	Defendant 115	chanelbags7.com
16	Defendant 116	chanelbags-online.com
17	Defendant 117	chanelbagsonlines.com
18	Defendant 118	chanel-bags-onsale.com
19	Defendant 119	chanelbagsstores.com
20	Defendant 120	chanel-bags-uk.co.uk
21	Defendant 121	chanelbagsus.net cheapchanelbagsforsale.net
22	Defendant 122	chanelbagswholesale.com
23	Defendant 123	chanelby.com
24	Defendant 124	chanel-chanel.net
25	Defendant 125	chanel-handbag.co.uk
26	Defendant 126	chanelhandbagschina.com
27	Defendant 127	chanelhandbagsky.com

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1	Defendant 128	chanelhandbags-outlet.net
2	Defendant 129	chanel-j12.org
3	Defendant 130	chanel-j12-watches.com
4	Defendant 131	chanelltdonline.com
5	Defendant 132	chanelonlineshopping.us
6	Defendant 133	chanelonsales.com
7	Defendant 134	chanel-outlet2011.com
8	Defendant 135	chaneloutlet-online.com
9	Defendant 136	chanelproduct.com
10	Defendant 137	chanelreplicaoutlet.us chaneloutletforsale.us
11	Defendant 138	chanelstore.net
12	Defendant 139	chanelsunglass2011.com
13	Defendant 140	chanelsunglasses2010.com
14	Defendant 141	chanelsunglasseshop.info
15	Defendant 142	chaneluksale.com
16	Defendant 143	chanelukshop.com chanelukstore.com
17	Defendant 144	chanel-watches.us
18	Defendant 145	chanelwatches-outlet.com
19	Defendant 146	charmtide.com
20	Defendant 147	cheapbagsonsale.com
21	Defendant 148	cheapbagsoutlet2011.com
22	Defendant 149	cheapchanelbagsforsale.com
23	Defendant 150	cheapchanelbags-outlet.com
24	Defendant 151	cheapchanelsunglasses.com
25	Defendant 152	cheapchanelsunglasses.net
26	Defendant 153	cheap-coachoutlet.com
27	Defendant 154	cheapdesignersunglassessale.com

1	Defendant 155	cheapdesignerwholesale.net
2	Defendant 156	cheaperchinaclothing.com
3	Defendant 157	cheapforsneakers.com
4	Defendant 158	cheaphandbag.biz
5	Defendant 159	cheaphandbags1.com
6	Defendant 160	cheap-handbags-sale.com
7	Defendant 161	cheaphandbagssale.us
8	Defendant 162	cheapoakleysoutlet.net
9	Defendant 163	cheapoakleysunglassesus.com
10	Defendant 164	cheapshoes169.com
11	Defendant 165	cheapsunglassesshop.net
12	Defendant 166	cheap-sunglasses-uk.com
13	Defendant 167	cheapsunglassesus.com
14	Defendant 168	cheap-supply.com
15	Defendant 169	cheaptiffanystore.com
16	Defendant 170	cheapwholesalefashion.com
17	Defendant 171	cheapwomens.org
18	Defendant 172	chinabrandonline.com
19	Defendant 173	chinaclothingsale.com
20	Defendant 174	china-export-suppliers.com
21	Defendant 175	china-fad.com
22	Defendant 176	chinafashionjewelry.net
23	Defendant 177	choose-you-like.com
24	Defendant 178	christian-outlet.net
25	Defendant 179	christyshop.com
26	Defendant 180	clyslshoes.com
27	Defendant 181	cnwholesalestore.com
28	Defendant 182	coachbags365.com

1	Defendant 183	coachhandbagsreplica.com
2	Defendant 184	cocochanelbag.com
3	Defendant 185	coolsunglasses2011.com
4	Defendant 186	coposhoe.com
5	Defendant 187	copyokay.com
6	Defendant 188	countyjewelrystore.com
7	Defendant 189	d9go.com
8	Defendant 190	damnfly.com
9	Defendant 191	designerbagsfactory.com
10	Defendant 192	designerclothestore.com
11	Defendant 193	designerdiscountbags.com
12	Defendant 194	designer-shoe.org
13	Defendant 195	designersunglasseshut2011.com
14	Defendant 196	designersunglassesstore.com
15	Defendant 197	designsunglass.com
16	Defendant 198	discountchanel-handbags.com
17	Defendant 199	discountchanelshops.com
18	Defendant 200	discountchanelstores.com
19	Defendant 201	discount-sunglasses-on-sale.com
20	Defendant 202	discountsunglassesoutlet.net
21	Defendant 203	discountsunglassessale.com
22	Defendant 204	divadollscloset.com
23	Defendant 205	dsqstock.com
24	Defendant 206	ecboots.com
25	Defendant 207	echeapclothing.com
26	Defendant 208	egohandbags.com
27	Defendant 209	eluxbag.com
28	Defendant 210	emiumiubags.com

1	Defendant 211	enreplica.com
2	Defendant 212	eralphlauren.com
3	Defendant 213	erbags.com
4	Defendant 214	eshoppinggucci.com
5	Defendant 215	ewcss.com
6	Defendant 216	facevogue.net
7	Defendant 217	faith-trade.com
8	Defendant 218	fake-bags.com
9	Defendant 219	fakechanelbagsshop.us
10	Defendant 220	fakesunglasseshut.com
11	Defendant 221	cheapchanelbagss.com fashionchanelbag.com
12	Defendant 222	fashionchanelhandbag.com
13	Defendant 223	fashioncheaphandbag.com
14	Defendant 224	fashioncheapjewelry.com
15	Defendant 225	fashionhandbagsplaza.com
16	Defendant 226	fashionkingdoms.com
17	Defendant 227	fashion-ol.com
18	Defendant 228	fashionpeoples.com
19	Defendant 229	fashionrealbags.com
20	Defendant 230	fashions4life.com
21	Defendant 231	firstfashion.biz
22	Defendant 232	frenchperfumeshop.com
23	Defendant 233	f-wholesale.com
24	Defendant 234	generaljewellery.com
25	Defendant 235	get-bag.com
26	Defendant 236	girl-sunglasses.com
27	Defendant 237	glassescheaponline.com

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1	Defendant 238	globalbuy.org
2	Defendant 239	go2like.com
3	Defendant 240	gogomalls.com
4	Defendant 241	goodcoachbag.com
5	Defendant 242	good-lookingshoes.com
6	Defendant 243	gooodbags.com
7	Defendant 244	groundmart.biz
8	Defendant 245	grunstore.com
9	Defendant 246	guccilvshoes.com
10	Defendant 247	guccipursewallets.com
11	Defendant 248	hahabags.com
12	Defendant 249	hahaclthing.com
13	Defendant 250	handbagcheapshop.com
14	Defendant 251	handbagpops.com
15	Defendant 252	handbags1688.com
16	Defendant 253	handbags4sell.com
17	Defendant 254	handbags-discount.com
18	Defendant 255	handbagshermes.com
19	Defendant 256	handbagstowholesale.com
20	Defendant 257	hao1574.com
21	Defendant 258	hatglass.com
22	Defendant 259	hatswarehouse.com
23	Defendant 260	heregogo.com
24	Defendant 261	hermesbagsseller.com
25	Defendant 262	highheels-retail.com
26	Defendant 263	hottrade2008.com
27	Defendant 264	hot-watch-shop.com
28	Defendant 265	infoed.net

1	Defendant 266	inwholesalestore.com
2	Defendant 267	irdatacorp.com
3	Defendant 268	italiandesigner2u.com
4	Defendant 269	items-trade.com
5	Defendant 270	j12channel.com
6	Defendant 271	jerseysmaker.com
7	Defendant 272	jewelrycollect.com
8	Defendant 273	jewelry-sterling-silver.com
9	Defendant 274	jewelrywholesalejewellery.com
10	Defendant 275	joybuyhandbags.com
11	Defendant 276	kaufenchanelonline.com
12	Defendant 277	kisstrend.com
13	Defendant 278	ladybagonsale.com
14	Defendant 279	ladybagsfactory.com
15	Defendant 280	likebuybags.com
16	Defendant 281	likeswisswatches.com
17	Defendant 282	lokobuy.com
18	Defendant 283	louboutin-christian.com
19	Defendant 284	louisvuittonhandbags.cc
20	Defendant 285	louisvuitton-lvhandbags.net
21	Defendant 286	louisvuittonpurses2.com
22	Defendant 287	louisvuitton-us.com
23	Defendant 288	lovebagstore.com
24	Defendant 289	luxecheaphandbags.com
25	Defendant 290	luxurybagsupplier.com
26	Defendant 291	luxurychanelgifts.com
27	Defendant 292	luxury-in-china.net
28	Defendant 293	lvbageshop.com

1	Defendant 294	lvgoodbag.com
2	Defendant 295	lv-sale.net
3	Defendant 296	mallofbag.com
4	Defendant 297	marcjacobshandbagssale.com
5	Defendant 298	mychanelkingdom.com
6	Defendant 299	myshoesdream.com
7	Defendant 300	myskyhandbags.com
8	Defendant 301	mysunglasseshut.com
9	Defendant 302	mywatch39.com
10	Defendant 303	nethotstore.com
11	Defendant 304	newbagscheap.com
12	Defendant 305	newfaithtrade.com
13	Defendant 306	nextangel.com
14	Defendant 307	niceniceshop.com
15	Defendant 308	nicesunglass.com
16	Defendant 309	nikeperfect.com
17	Defendant 310	novbags.com
18	Defendant 311	oakley2sunglasses.com
19	Defendant 312	oakleyssunglasses-hot.com oakleysunglasses-hot.com
20	Defendant 313	oakleytopsale.com
21	Defendant 314	oksunglassesforcheap.com
22	Defendant 315	oksunglasseshut.com
23	Defendant 316	online-fashiongoods.com
24	Defendant 317	onlinetradese.com
25	Defendant 318	outlet-express.net
26	Defendant 319	paypalcoachpurses.com
27	Defendant 320	popbrands.net

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1	Defendant 321	purelife-bags.com
2	Defendant 322	purses-chanel.com
3	Defendant 323	relyshops.com
4	Defendant 324	replicachanel2u.org
5	Defendant 325	replicachanelonline.com
6	Defendant 326	replica-coco-lv.com
7	Defendant 327	replicadesignerhandbagssale.com
8	Defendant 328	replica-fake-watches.com
9	Defendant 329	replicahandbagss.org
10	Defendant 330	replicarayban.net
11	Defendant 331	replicas-bags-store.com
12	Defendant 332	replicashandbags.biz
13	Defendant 333	replica-supplier.com
14	Defendant 334	replicas-watches-sell.com
15	Defendant 335	replica-watches-eshop.com
16	Defendant 336	repliwatch.com
17	Defendant 337	republic-handbags.com
18	Defendant 338	rescuewallet.com
19	Defendant 339	sale66.com
20	Defendant 340	salehandbagsbags.com
21	Defendant 341	saleraybansunglasses.org
22	Defendant 342	saveintrade.com
23	Defendant 343	buy4cheaps.fr selfband.com
24	Defendant 344	sellpurse.com
25	Defendant 345	selsales.com
26	Defendant 346	shangtrade.com
27	Defendant 347	sheerbeautybareminerals.com

1	Defendant 348	shoesrunning.com
2	Defendant 349	shopcn.biz
3	Defendant 350	shopingstock.com
4	Defendant 351	storereplica.com
5	Defendant 352	sumbags.com
6	Defendant 353	sunglassesrayban.net
7	Defendant 354	sunglassessaler.com
8	Defendant 355	sunglasses-shoppe.com
9	Defendant 356	sunglassessky.com
10	Defendant 357	sunglasses-sky.com
11	Defendant 358	sunglassko.com
12	Defendant 359	sunglassoutlet.us
13	Defendant 360	supplyshoes.com
14	Defendant 361	swissreplica.co.uk
15	Defendant 362	swissreplicauk.com
16	Defendant 363	thefirstbag.com
17	Defendant 364	thevoguelady.com
18	Defendant 365	tiffanyand-co.com
19	Defendant 366	tiffanyonlineus.net
20	Defendant 367	tiffanyoutletus.com
21	Defendant 368	topbagswell.com
22	Defendant 369	topluxurybagsoutlet.com
23	Defendant 370	topreplicaonline.com
24	Defendant 371	topwholesalestore.com
25	Defendant 372	tradingbus.com
26	Defendant 373	usayahooo.com
27	Defendant 374	ushandbagswholesale.com
28	Defendant 375	ustoryburchoutlets.com

1	Defendant 376	voguechanel.com
2	Defendant 377	wal-watch.com
3	Defendant 378	watcharoo.com
4	Defendant 379	watches-7.com
5	Defendant 380	watchsaleshop.com
6	Defendant 381	weekendbuy.com
7	Defendant 382	wholesalechanelshoes.info
8	Defendant 383	wholesalecheapjewelrychina.com
9	Defendant 384	wholesale-coach-bags.com
10	Defendant 385	wholesaledesignerhandbags.us
11	Defendant 386	wholesalejewelry168.com
12	Defendant 387	wholesalejewelrycity.com
13	Defendant 388	wholesalejewelry-fashion.com
14	Defendant 389	wholesalenikeshoes.com
15	Defendant 390	wholesalepursesforcheap.com
16	Defendant 391	winksandco.com
17	Defendant 392	womensfashionshop.com
18	Defendant 393	worldbrandhandbags.com
19	Defendant 394	xmasgate.com
20	Defendant 395	yahbags.com
21	Defendant 396	yearhandbags.com
22	Defendant 397	yourjeansyouchoose.com
23	Defendant 398	yys66.com
24	Defendant 399	chanel-bags.me

25 * - Denotes blog style website.
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